

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION**

Civil Action No. 3:16-md-2738-FLW-LHG  
The Honorable Freda L. Wolfson

**MDL No. 2738**

This Document Relates to:  
*Felicia Hill-Porter, individually and on behalf  
of the Estate of Dorothy Hill*  
*3:18-cv-15598*

**DECLARATION OF KEITH GRIFFIN IN SUPPORT OF PLAINTIFF'S  
OPPOSITION TO DEFENDANT'S MOTION TO DISMISS**

I, Keith Griffin, declare:

1. I make this declaration of my own personal knowledge.
2. I am counsel of record for Plaintiff Felicia Hill-Porter, and am duly licensed to practice law in California. I make this declaration in support of the opposition to Defendants' Motion to Dismiss.
3. I understand that the Court issued an order concerning curing the Plaintiff Profile Form. Unfortunately, my office has lost contact with Ms. Felecia Hill-Porter.
4. On September 1<sup>st</sup>, while attempting to contact Felecia Hill-Porter, legal representative of decedent Dorothy Hill, my firm confirmed that her phone number had been disconnected. We subsequently sent out correspondence by email and mail to the last known address we have for Ms. Hill-Porter. We have not yet received a response. We have also conducted independent database searches to attempt to find new contact information for Ms. Hill-Porter but have not yet been successful.

5. On October 16, 2020, GirardiKeese attempted, unsuccessfully, to contact Plaintiff by calling various phone numbers and sending an email to the last know email address.

6. Attached herewith as **EXHIBIT A** is a true and correct copy of the September 23, 2020 statement of counsel, which I filed in response to the Court's order.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 19<sup>th</sup> day of October 2020, at Los Angeles, California.

/s/ Keith D. Griffin  
Keith Griffin